EXHIBIT I

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

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To Rafe Adelman	From Bruce E	
Co./Dept. George Chebreau	Co.	
Phone #	Phone #	
Fax #	Fax #	

August 10, 2000

Mr. Bruce Edelson, P.E.
Qualified Settlement Fund
28520 Meadowmist Drive
Rancho Palos Verdes, CA 90275

SOIL CLOSURE - LAWRY'S CALIFORNIA CENTER, FORMER CHROMAL PLATING FACILITY, 528 SAN FERNANDO ROAD, LOS ANGELES (FILE NO. 95-094)

Dear Mr. Edelson:

We have received and reviewed the *Soil Remediation Report* dated November 23, 1999. The report transmits information on the soil remediation activities completed and requests that this Regional Board issue a soil closure letter for the above-referenced site.

Chromal planting operations, which began in the 1940s, ceased at this site in about 1960. The site is comprised of approximately 2.3 acres, which is currently being used as a parking area. The northern portion of the former chromal site, coinciding with the Golden State Freeway overpass and adjacent right-of-way area, is owned by Caltrans and is restricted in land use to industrial. Various site assessment activities have been completed to date to characterize the site conditions. Soil samples collected to date have detected soluble chromium concentrations up to 11 mg/L, total chromium concentrations up to 19,443 mg/kg, and hexavalent chromium up to 1,600 mg/kg.

Soil was remediated to approximately 41 feet below ground surface (bgs). Shallow soil was excavated to a depth of approximately 5 feet bgs. The soil remedial action completed at the site, consisted of in situ treatment and stabilization of chromium-impacted vadose zone soils, which involved a two-pass (treatment and then stabilization) soil mixing process. The chromium-affected soils were treated with a ferrous sulfate slurry as a reducing agent to convert hexavalent chromium into trivalent chromium and the soils treated were then stabilized with portland cement. The total volume of soils treated and stabilized is approximately 6,671 cubic yards. Following the completion of soil remediation activities, a two foot cap was placed over the stabilized soil to prevent human exposure and limit potential leaching of the remaining residual amounts of chromium into groundwater. In addition, much of the area in which the treatment process was accomplished is below the freeway overpass, further sheltering it from rainwater and minimizing potential leaching.

A total of 74 soil confirmation samples were collected and analyzed from the treated area following the remediation activities. Analytical results from all of the soil confirmation samples collected were below the cleanup levels approved by this Regional Board, with hexavalent chromium and total chromium detected with a maximum concentration of 1.9 mg/kg and 717 mg/kg, respectively. Based on these results, the soil remediation activities completed appear to have been successful in remediating the hexavalent chromium impacted soil at this site. The remaining treated chromium impacted soil is now isolated in a low-permeability, cemented soil matrix, which in conjunction with the cap will limit the potential leaching of the remaining residual amounts of chromium into groundwater.

Groundwater underlies this facility at approximately 40 feet bgs. Groundwater monitoring has been conducted for approximately 6 1/2 years at this site. Hexavalent chromium has been detected in groundwater beneath the site at concentrations up to 34 mg/L (1994), with the current, post remediation, maximum concentrations up to 0.110 mg/l (2000). The chromium groundwater plume identified appears to have stabilized and the chromium concentrations in groundwater have generally decreased over time. As specified in the Cleanup and Abatement Order (CAO No. 99-037) issued for this site, the underlying groundwater will continue to be monitored for 2 years following the soil remediation activities.

Based upon the information submitted, the Regional Board has determined that no further action for the underlying soil is required for this site. The need to continue groundwater monitoring or implement an active groundwater remediation system for the cleanup of the chromium groundwater plume will be evaluated upon the completion of the post-remedial groundwater monitoring program. You are authorized to continue groundwater monitoring activities quarterly through the 3rd quarter 2000 and submit the Evaluation of Groundwater Conditions Report as required in Attachment A of the CAO. Contingent on the results from the 3rd quarter groundwater sampling activities, a semi-annual groundwater sampling schedule, starting with the 1st quarter 2001, may be considered.

If you have any questions regarding the above, please contact Ms. Ana Townsend at (213) 576-6738.

Sincerely,

Dennis A. Dickerson
Executive Officer

cc: Jennifer S. Rothman, Levine-Fricke